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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

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10 UNITED STATES OF AMERICA,) 2:15-mj-00397-VCF
11 Plaintiff,)
12 vs.) STIPULATION TO CONTINUE
13 BRYAN ALI FERRALES-PORTILLO,) TRIAL (1st REQUEST)
14 Defendant.)
15 _____)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel
18 for the United States of America, and Heidi A. Ojeda, Federal Public Defender, counsel for
19 defendant **Bryan Ali Ferrales-Portillo** that the trial date currently set for Wednesday, July 22,
20 2015 at 9:00 a.m., be vacated and continued for thirty (30) days or to a date and time convenient
21 to the Court.

22 This stipulation is entered into for the following reasons:

23 1. The parties are in the process of negotiating a resolution of the case that would
24 obviate the need for trial. The parties need additional time to do so.

1 2. Counsel for the government has a calendar conflict.

2 3. The Defendant is not in custody and agrees to the continuance.

3 4. Denial of this request for a trial continuance would prejudice both the
4 Defendants and the Government and unnecessarily consume this Court's valuable resources,
5 taking into account the exercise of due diligence.

6 5. Additionally, denial of this request for continuance could result in a miscarriage
7 of justice.

8 6. The additional time requested by this stipulation, is excludable in computing the
9 time within which the defendant must be indicted and the trial herein must commence pursuant
10 to the Speedy Trial Act, 18 U.S.C. § 3161(b) and § 3161(h)(8)(A), considering the factors under
11 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

12 7. There have been no previous requests for a continuance of the trial in this case.

13
14 DATED this 16th day of July, 2015.

15 Respectfully submitted,

16 DANIEL G. BOGDEN
17 United States Attorney

18 By: _____
19 Heidi A. Ojeda

20 Federal Public Defender
Counsel for the Defendant
BRYAN ALI FERRALES-PORTILLO

21 /s/ Nadia Ahmed
22 By: _____
23 Nadia Ahmed
24 Special Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,) 2:15-mj-00397-VCF
Plaintiff,)
vs.) ORDER CONTINUING TRIAL
YRAN ALI FERRALES-PORTILLO,)
Defendant.)

Based on the pending stipulation of counsel, and good cause appearing therefore, the court hereby finds that:

IT IS HEREBY ORDERED that the deadline to continue the trial, currently scheduled for July 22, 2015, at the hour of 9:00 a.m., is continued to 9:00 a.m., November 4, 2015.

DATED this 20th day of July, 2015

UNITED STATES MAGISTRATE JUDGE